

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

IN RE: NEW ENGLAND COMPOUNDING  
PHARMACY, INC. PRODUCTS LIABILITY  
LITIGATION

MDL No. 1:13-md-02419

THIS DOCUMENT RELATES TO:

All Actions.

Hon. F. Dennis Saylor, IV  
Magistrate Jennifer C. Boal

**CONSENT MOTION FOR ADDITIONAL EXTENSION OF TIME FOR PLAINTIFFS TO  
RESPOND TO TRAVELERS PROPERTY CASUALTY COMPANY OF AMERICA'S  
MOTION TO QUASH PLAINTIFFS' SUBPOENA**

With the consent of Travelers Property Casualty Company of America ("Travelers"), and pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), the Plaintiffs' Steering Committee ("PSC") hereby moves the Court for an order extending the PSC's time to file its response to Travelers' Motion to Quash Plaintiffs' Subpoena (Dkt. No. 633), from January 10, 2014 to and including January 17, 2014. The PSC seeks this additional stipulated extension to continue to work with Travelers' counsel to resolve any outstanding issues and to finalize the PSC's response in the event that agreement cannot be reached.

WHEREFORE, the PSC respectfully pray for an order extending its time to respond to the motion to January 17, 2014. A stipulated, proposed order has been submitted.

Respectfully submitted,

/s/ Marc E. Lipton

Marc E. Lipton  
LIPTON LAW  
18930 West Ten Mile Rd. Ste. 3000  
Southfield, MI 48075  
(248) 557-1688  
(248) 557-6344 *facsimile*  
[marc@liptonlaw.com](mailto:marc@liptonlaw.com)

Dated: January 9, 2014

*Plaintiffs' Steering Committee*

**CERTIFICATE OF SERVICE**

I hereby certify that on this day of January 9, 2014, I electronically filed the foregoing CONSENT MOTION FOR ADDITIONAL EXTENSION OF TIME FOR PLAINTIFFS TO RESPOND TO TRAVELERS PROPERTY CASUALTY COMPANY OF AMERICA'S MOTION TO QUASH PLAINTIFFS' SUBPOENA by using the CM/ECF system which will send a notice of electronic filing to all counsel of record and electronic mail on the following:

Brian M. Cullen  
Law Office of Steven B. Stein  
Two Financial Center  
60 South Street, Suite 1000  
Boston, MA 02111-2759  
(617) 772-2905  
[bcullen@travelers.com](mailto:bcullen@travelers.com)

/s/ Marc E. Lipton  
Marc E. Lipton  
LIPTON LAW  
18930 West Ten Mile Rd. Ste. 3000  
Southfield, MI 48075  
(248) 557-1688  
(248) 557-6344 *facsimile*  
[marc@liptonlaw.com](mailto:marc@liptonlaw.com)